

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

**ANGEL DAVID MORALES
VALLELLANES,
Plaintiff,**

v.

**JOHN POTTER, UNITED STATES
POSTMASTER GENERAL, ET ALS.,
Defendants.**

CIVIL NO. 97-2459 (GAG)

**DAMAGES BASED ON
RETALIATION AND
DISCRIMINATION; PROHIBITED
PERSONNEL PRACTICES; UNFAIR
LABOR PRACTICES; BREACH OF
COLLECTIVE BARGAINING
AGREEMENT**

**TRIAL BY JURY IS HEREBY
REQUESTED**

MOTION TO URGENTLY SCHEDULE STATUS CONFERENCE

COMES NOW, plaintiff Angel David Morales-Vallellanes through his legal counsel and very respectfully inform this Honorable Court:

1. This Honorable Court denied a motion to vacate order filed by Plaintiff last September 12, 2006 (docket 293). Said order also granted a protective order requested by Plaintiff.
2. Plaintiff has emphasizes in every motion that he has complied with this Honorable Court's order to provide within the deadline of July 1st, 2006 Doctor Hoyos' expert report.
3. Also, Plaintiff did comply earlier within the deadline (which was June 2, 2006) the provision of his economic expert witness Vicente Feliciano's report, however this Honorable Court also exclude Plaintiff economic expert witness notwithstanding the fact that Plaintiff delivered his economic report on the date ordered by this Honorable Court (June 2, 2006).
4. The decision by this Honorable Court to preclude both parties to present expert witnesses in fact only affects and punish Plaintiff since Plaintiff have the burden of proof. It is not necessary for Defendants to present expert witnesses if Plaintiff is not allowed to present them.

5. Plaintiff is under the impression that this Honorable Court has not asserted his claim of compliance.

6. The appearing party respectfully requests an urgent schedule of a status conference in order to discuss the above mentioned matters.

WHEREFORE, it is respectfully requested from this Honorable Court for an urgent schedule of a status conference to discuss the above mention matters.

RESPECTFULLY SUBMITTED.

I HEREBY CERTIFY that on September 21, 2006, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF System which will send notification of such filing to the following: **Fidel A. Sevillano-Del Río, Esq.**, Assistant U.S. Attorney, Federico Degetau Federal Build., 150 Carlos Chardón Av., Hato Rey, Puerto Rico 00918.

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